



March 9, 2010

NCUA
via email

RE: Proposed Regulation 12 C.F.R. Part 704

We have reviewed the proposed regulation and want to respond with suggestions. We currently use Members United Corporate FCU and want to continue using Members United FCU for many services including:

- Liquidity
- Investments
- Ordering cash and currency
- Check imaging
- Funds transfer
- ACH origination
- Line of Credit

We believe the NCUA proposed regulation needs to be modified or Interra will face increased costs and fewer credit union-owned services.

- The **average-life requirement** of two years would not allow the Corporates to lend over a longer time frame which is needed by some credit unions.
- **Legacy assets** are not addressed. This needs to be addressed before Corporates and member credit unions can determine the best strategies for the future.
- Corporates need to have the ability to **redeem certificates at a premium**. Corporates certificates would be less liquid and therefore would not be able to offer competitive interest rates on certificates.

We also believe there needs to be **consolidation of the Corporates** to create efficiency of operations. Efficiency could be gained through consolidating check image processing, payment transfer systems, investments and many of the redundant services the Corporates offer.

Sincerely,

A handwritten signature in black ink, appearing to read "Rex Hochstedler".

Rex Hochstedler
Interra Credit Union
CFO